

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Case No. 5:24-MJ- 397 (ML)

JAHIL WILLIAMS,

Defendant

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of August 27, 2024, in the county of Onondaga in the Northern District of New York the defendant violated:

*Code Section*

Title 18, United States Code, Section  
922(g)(1)

*Offense Description*

Felon in Possession of a Firearm

This criminal complaint is based on these facts:  
See Attached Affidavit.

☒ Continued on the attached sheet.

*Richard Gardinier 5999*

*Complainant's signature*

Richard Gardinier, ATF Special Agent

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: August 28, 2024

*Miroslav Lovric*

*Judge's signature*

City and State: Binghamton, NY

Hon. Miroslav Lovric, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Richard Gardinier, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint charging Jahlil WILLIAMS, the defendant, with a violation of Title 18, United States Code, Section 922(g)(1) (Felon in Possession of a Firearm).

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been since January 2, 2017. I have attended the Federal Law Enforcement Training Center (“FLETC”), located in Glynco, Georgia, where in I was enrolled in, and successfully completed, both Criminal Investigator Training Program (“CITP”) and Special Agent Basic Training (“SABT”). During the course of my training, I received instruction on physical surveillance, interviewing sources of information and defendants, reviewing telephone and financial records, applying for and serving search warrants, and other investigative techniques related to firearms trafficking. Prior to my time with ATF, I was employed by the United States Secret Service, Uniformed Division (“USSS/UD”) for four years. I was enrolled in and successfully completed the Uniformed Police Training Program (“UPTP”) at FLETC, as well as New Officer Training with the USSS/UD, located in Beltsville, Maryland.

3. I am an investigative, or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States who is empowered by law to conduct investigations of and make arrests for the offenses enumerated in Title 18, 21 and 26, United States Code.

4. The facts in this affidavit come from my personal observations, my training and experience as an ATF Special Agent, and information obtained from other law enforcement officials and civilian witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause to believe that WILLIAMS has violated Title 18, United States Code, Section 922(g)(1).

#### **FACTS ESTABLISHING PROBABLE CAUSE**

5. On August 27, 2024, officers and detectives of the New York State Police (“NYSP”) were conducting a proactive detail in and around the Destiny USA Mall, located on Destiny USA Drive, Syracuse, Onondaga County, within the Northern District of New York. While on patrol in an unmarked vehicle, a NYSP detective observed a black Toyota Highlander bearing Georgia license plate CYL6730 (the “VEHICLE”) operating in the mall parking lot. As the VEHICLE and the unmarked NYSP vehicle passed each other, NYSP detectives could smell the strong odor of burning marijuana emanating from the VEHICLE. Detectives followed and surveilled the VEHICLE as it left the mall parking lot and travelled on public roadways, entering an on-ramp to Interstate 81 southbound. As the VEHICLE merged onto the highway, it crossed over a solid fog line, committing a New York State Vehicle and Traffic Violation for failing to maintain its lane. At this point, the NYSP detectives activated their emergency lights and initiated a traffic stop, investigating a possible Driving While Ability Impaired (“DWAI”) violation.

6. Officers and detectives approached the VEHICLE and observed WILLIAMS, the sole occupant of the vehicle, in the driver’s seat. Officers could smell the strong odor of burning marijuana coming from inside the passenger compartment of the vehicle. Officers could see, in plain view, an

ash tray in the cupholders located in the center console of the VEHICLE which appeared to have ashes and other paraphernalia consistent with marijuana cigarettes. Officers asked WILLIAMS if he had smoked marijuana, and WILLIAMS admitted to having done so earlier that same day. Officers noted WILLIAMS' eyes appeared bloodshot and, based on their training and experience in prior DWAI investigations, asked WILLIAMS to step out for the purpose of administering the Standardized Field Sobriety Tests ("SFSTs").

7. While one officer was beginning the SFSTs on WILLIAMS, others began searching the area of the passenger compartment of the VEHICLE within reach of the driver's seat. Officers located a black satchel behind the passenger seat, within reach of the VEHICLE's driver's seat. Officers opened the bag and located 10 "bricks"<sup>1</sup> of what appeared to be a heroin/fentanyl mixture; several small baggies of a white powdery substance packaged for sale; approximately \$6,000.00 in US currency; a scale with a white powdery substance on it which later field tested positive for cocaine; and various packaging materials such as glassine envelopes and rubber bands consistent with the distribution of heroin and/or fentanyl. The suspected narcotics were later field tested, and the substances tested positive for, respectively, fentanyl and cocaine.

8. Officers placed WILLIAMS under arrest for possession of the controlled substances located within the VEHICLE. WILLIAMS was searched incident to arrest. A firearm was found in the waistband of WILLIAMS' pants. The firearm was a Glock 43X 9mm caliber pistol bearing serial number BSMP582. WILLIAMS is a felon, having been convicted of the New York State offense of Criminal Possession of an Assault Weapon—3<sup>rd</sup> Degree on April 15, 2022. The firearm was not

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<sup>1</sup> A "brick" is a term commonly used to describe a package containing several glassine envelopes, inside of which is commonly a mixture of heroin, fentanyl and/or analogues. Bricks are commonly stamped with a logo so as to identify the product and/or its distributor to customers. Customers commonly purchase "bricks" or "bundles" (contained within bricks) that contain quantities of narcotics for personal use.

manufactured in New York State and based on information currently available to agents, was likely manufactured in the State of Georgia.

9. WILLIAMS was transported to the North Syracuse NYSP Barracks for processing. At the NYSP barracks, WILLIAMS was advised of his *Miranda* rights by NYSP Detective Jonathon Gallo. WILLIAMS knowingly and voluntarily waived his *Miranda* rights and agreed to answer questions without an attorney present. During the ensuing interview, WILLIAMS admitted that he was aware that he had been previously convicted of a felony; that he was currently under the supervision of New York State Probation for a sentence arising out of that felony conviction; and that he was not permitted to possess a firearm based on that conviction.

### CONCLUSION

10. In light of the foregoing, there is probable cause to establish that WILLIAMS has violated Title 18, United States Code, Section 922(g)(1) as described herein. I respectfully request the Court authorize the filing of this complaint so that the defendant may be brought to court for further proceedings in accordance with the law.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS  
OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

Richard Gardinier 5999  
Richard Gardinier  
ATF Special Agent

I, the Honorable Miroslav Lovric, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on August 28, 2024, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Miroslav Lovric  
Hon. Miroslav Lovric  
United States Magistrate Judge